

## REMARKS

In response to the final Office Action of February 22, 2006, an Amendment was filed on April 24, 2006, but that Amendment was not entered on the ground that it raised new issues. Accordingly, the claim changes requested in that amendment should be ignored because this Preliminary Amendment responding to the Office Action of February 22, 2006 is being filed with the accompanying Request for Continued Examination.

In this regard, the present invention relates to an image pick-up apparatus comprising a plurality of photoelectric conversion elements and TFTs of amorphous silicon formed on an insulating substrate, by thin film technology, with the surface being flattened. Also, a wavelength converter having columnar crystal declines due to the flattening step, and a protective layer formed from inorganic material is arranged in a wider area than the area where the photoelectric conversion elements and TFTs are arranged, in order to stabilize the device.

However, due to the influence of stress, for example, it is difficult to make the protective layer sufficiently thick when formed from inorganic material, with the result that on the surface of the protective layer, a step formed on the surface of the photoelectric conversion elements remains. In order to flatten that step on the surface, a flattening layer formed from organic material is arranged and it separates the function of the layer so to stabilize the device and to flatten the surface.

To this end, the flattening layer is formed thicker than the protective layer and is arranged in a wider area compared to the area where the wavelength converter is arranged. By separating the function of the layer and stabilizing the device with the protective layer where the wavelength converter is arranged, it is possible to achieve an image pick-up

apparatus with stabilization and high photographic sensitivity, thereby solving the technical issues mentioned at Page 8, line 20-Page 9, line 11 of the Specification.

None of the cited references discloses the claimed surface step caused by the amorphous silicon photoelectric conversion elements formed on an insulating substrate, nor the protective layer formed from an inorganic material, wherein a surface of said protective layer has surface steps according to steps formed between areas of the photoelectric conversion elements and peripheral areas thereof, and wherein the protective layer is arranged in a wider area compared to the area where said photoelectric conversion elements and said TFTs are arranged. Also, none of the references discloses the claimed requirement for the flattening layer being arranged in a wider area compared to the area where said wavelength converter is arranged, or that the flattening layer is thicker than the protective layer.

For these various reasons a Notice of Allowance is solicited in this application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Krause", is written over a horizontal line.

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